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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 13 2005

05-AMCP-0271

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Office of Environmental Cleanup
Hanford Project Office
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EDMC

Addressees:

ADMINISTRATIVE CLOSURE OF THE 216-U-12 CRIB (TSD: D-2-8)

Enclosed is the U.S. Department of Energy, Richland Operations Office (RL) request for State of Washington, Department of Ecology (Ecology) approval for administrative closure of the 216-U-12 Crib. This submittal is in support of the upcoming public involvement period for the 216-U-12 Crib treatment, storage, and disposal (TSD) unit.

Enclosure 1 identifies the documents used as a basis for the administrative closure which were provided to John Price of Ecology on May 6, 2005. During the May 6, 2005, presentation, the former UO3 Process Engineer for the period in question, offered a first hand account to further reinforce the fact that the 216-U-12 Crib did not receive hazardous wastes after July 27, 1987.

The documentation presented to Ecology on May 6, 2005, resulted from a due diligence search of records and interviews. A due diligence search was conducted to determine that the unit did not treat, store, and/or dispose of hazardous and/or mixed waste after an effective date of regulation. In the case for the 216-U-12 Crib, the current Dangerous Waste Permit Application Part A Form identifies corrosive mixed waste as the type of waste in question. Results of the due diligence search was then compared to the effective date of Ecology's regulatory authority for mixed waste. The agreed upon date between Ecology and RL on when the mixed waste rule applies is August 19, 1987. Any discharges occurring before this effective date would constitute a past practice waste site.

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Draft Tri-Party Agreement Change Requests modifying Appendix B and Appendix C are enclosed as Enclosures 2 and 3. The 216-U-12 Crib will be removed from the list of TSDs contained in Appendix B and will be completed as a Resource Conservation and Recovery Act past practice site under the 200-UW-1 Operable Unit. Finalization of the Tri-Party Agreement change packages are predicated upon Ecology's acceptance of the administrative closure of the 216-U-12 Crib. When finalized, the signed Tri-Party Agreement Change Requests will be submitted to Ecology and the U.S. Environmental Protection Agency for approval.

We appreciate your continued support as we work to cleanup Hanford in an efficient and cost-effective manner.

If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein
Manager

AMCP:KDL

Enclosures

cc w/encls:

K. B. Allison, FFS
B. L. Becker-Khaleel, Ecology
G. Bohnee, NPT
R. C. Brunke, FHI
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T. Martin, HAB
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E. J. Murphy-Fitch, FHI
K. Niles, ODOE
J. B. Price, Ecology
V. L. Peery, Ecology
F. A. Ruck, FHI
J. P. Shearer, FHI
J. D. Williams, FHI
Administrative Record
Environmental Portal

**LIST OF DOCUMENTS USED AS A BASIS FOR
PROCEDURAL CLOSURE
CERTIFICATION**

The following list of documents was used to demonstrate that the 216-U-12 Crib treatment, storage, and disposal (TSD) unit has never actually been used to treat, store, or dispose of corrosive mixed waste, regulated pursuant to the requirements of Chapter 173-303, Dangerous Waste Regulations, Washington Administrative Code (WAC). These documents were provided to John Price of Ecology on May 6, 2005.

- 1 Engineering Log book UO3 Plant, RHO-RE-NB-234, pages 7 through 13, and 77 through 102.
This log book provides an account of activities during 1987 from an engineering standpoint. It also documents that the last corrosive mixed waste discharge to the 216-U-12 Crib last occurred in February 1987.
- 2 Operations Log book, pages 270-304.
This log book provides an account of activities during 1987 from an operations standpoint. It demonstrates that no accidental discharges occurred after the effective date of mixed waste (August 19, 1987), until the time the 216-U-12 Crib was cut and capped (February 1, 1988).
- 3 Letter, From G. E. Millward, Staff Engineer, Westinghouse Hanford Company, to D. W. Medley, Westinghouse Hanford Company, "Characterization of Process Condensate to 216-U-12 Crib," dated January 4, 1989.
This letter documents that there were no discharges of corrosive mixed waste after July 27, 1987. This date is the effective date of Substitute Senate Bill 5071, amending the Revised Code of Washington to add 70.105.109 concerning mixed waste.
- 4 Dangerous Waste Permit Application, Part A, Form 3 for the 216-U-12-Crib, Revision 0, September 1, 1987.
The original Part A for the 216-U-12 Crib contains language concerning the operations of the UO3 plant.
- 5 Plant Operating Procedure, UO-080-006, "UO3 Environmental Sampling" (also known as Sample UO3 Liquid Effluent), Procedural History Data Sheet, and Revision B-0, dated June 4, 1987.
This procedure shows the sampling methodology for the 216-U-12 Crib effluent discharges.
- 6 Temporary Work Procedure UO-WP-0002, "Neutralize TK-C5 Process Condensate at 224-U," Revision A-0, dated June 4, 1986.
This procedure shows that the temporary neutralization system was in place in 1986. It demonstrates DOE was proactive about eliminating the corrosive mixed waste discharges.

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- 7 Work Plan, UO-WP-0007, "Measure the pH Buffer Capacity of Tank C-5 Using Phosphoric Acid and Potassium Hydroxide," dated April 13, 1987.
This work plan contains provisions to prevent corrosive discharges to the 216-U-12 Crib when buffering chemicals were being evaluated for the neutralization system.
- 8 Annual Report, "Westinghouse Hanford Company Effluent Releases and Solid Waste Management Report for 1987: 200/600/1100 Areas," Westinghouse Hanford Company, dated May 1998, Section 6.0 and Appendix A.9.3.
This annual report documents no additional discharges in 1987.
- 9 Congressional Report, "Plan and Schedule to Discontinue Disposal of Contaminated Liquids Into the Soil Column at the Hanford Site, Response to Congressional Request," dated March 16, 1987, pages iii and iv, 7-8, 11-12, and 26.
This report shows DOE's awareness of the need to eliminate and control liquid discharges to the soil column at the Hanford Site to Congress.

Change Number	Federal Facility Agreement and Consent Order		Date:	
B-05-02	Change Control Form		May 11, 2005	
Do not use blue ink. Type or print using black ink.				
Originator: K. D. Leary/D. E. Jackson, RL		Phone: 509-373-7285/509-376-8086		
Class of Change:				
<input type="checkbox"/> I - Signatories		<input checked="" type="checkbox"/> II - Executive Manager		<input type="checkbox"/> III - Project Manager
Change Title:				
Delete the 216-U-12 Crib from Appendix B of the Tri-Party Agreement Action Plan				
Description/Justification of Change:				
<p>With the procedural closure of the 216-U-12 Crib, the Crib will be removed from Appendix B and remediated as an RPP under the 200-UW-1 OU in Appendix C.</p> <p>Modifications/deletions to Appendix B are included as page 2. Changes to the Appendix are denoted using redline/strikeout; additions are denoted with <u>shading</u>.</p>				
Impact of Change:				
This is an administrative change modifying Appendix B of the Tri-Party Agreement; there is no impact to Tri-Party Agreement milestones or schedule.				
Affected Documents:				
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).				
Approvals:				
_____	_____	___ Approved	___ Disapproved	
K. Klein, RL	Date			
_____	_____	___ Approved	___ Disapproved	
M. A. Wilson, Ecology	Date			
_____	_____	___ Approved	___ Disapproved	
N. Ceto, EPA	Date			

Appendix B

Listing of Treatment, Storage and Disposal Groups/Units

(sheet 3 of 17)

Treatment, Storage and Disposal			Planned Action	
Group Number	Group/Units	Operable Unit if applicable)	Closure*	Operating Permit
D-2-8	216-U-12 Crib	200-UP-2	X	
D-2-9	Low-Level Burial Grounds			
	218-E-10			Landfill
	218E-12B			Landfill
	218-W-3A			Landfill
	218-W-3AE			Landfill
	218-W-4B			Landfill
	218-W-4C			Landfill
	218-W-5			Landfill
	218-W-6			Landfill
S-2-1	PUREX Tunnels 1 and 2			Storage
	218-E-14			
	218-E-15			
T-2-4**	221-T Containment System Test Facility		X	
TS-2-1	222-S Laboratories Treatment Tanks and Storage Building			
	222-S Pad			Storage
	***218-S Hot Waste Facility Tank 102			Treatment
	***219-S Hot Waste Facility Tank 103			Treatment

Change Number	Federal Facility Agreement and Consent Order		Date:	
C-05-01	Change Control Form		May 11, 2005	
Do not use blue ink. Type or print using black ink.				
Originator: K. D. Leary, RL/D. E. Jackson, RL		Phone: 509-373-7285/509- 376-8086		
Class of Change:				
<input type="checkbox"/> I - Signatories		<input checked="" type="checkbox"/> II - Executive Manager		<input type="checkbox"/> III - Project Manager
Change Title:				
Delete Regulatory Designation Identified for the 216-U-15 Crib and Remove Footnote for the 216-U-12 Trench in Appendix C of the Tri-Party Agreement				
Description/Justification of Change:				
<p>Appendix C of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) lists Hanford waste sites that potentially require remediation. When the U.S. Department of Energy (RL), the U.S. Environmental Protection Agency (EPA) and the State of Washington, Department of Ecology (Ecology), hereinafter referred to as the Parties, first negotiated the Hanford Site cleanup program, the waste sites were divided into operable units (OU's). OU groupings were based on the likely response scenarios including both sampling and analysis and remedial action. OU groupings were revised as the likely response scenarios changed. Each OU (and the waste sites contained therein) was defined as a Resource Conservation and Recovery Act (RCRA) Past Practice Site (RPP) or a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Past Practice Site (CPP) based primarily on the presence or absence of RCRA treatment, storage, or disposal facilities within the OU.</p> <p>The 216-U-15 Trench is listed under the 200-UW-1 Operable Unit (OU). The OU is classified as RPP. When Appendix C was modified (Tri-Party Agreement Change Request C-03-01), the *CPP was inadvertently placed in the Status column for this trench. That reference should be deleted and the Trench will be completed as an RPP. Changes to Appendix C are included as pages 2 and 3 of this change package.</p> <p>Appendix B of the Tri-Party Agreement contains the listing of treatment, storage, and disposal groups/units (TSDs). The 216-U-12 Crib did not receive corrosive mixed waste after February 1987 and has sufficient documentation that supports that the TSD was never actually used to treat, store or dispose of mixed waste after Ecology's date for mixed waste regulatory authority. That determination satisfies the requirements for procedural closure in accordance with the Tri-Party Agreement Action Plan Section 6.3.3, <i>Procedural Closure</i>. Therefore, the double asterisks (**) will be deleted from the 216-U-12 Crib in Appendix C since the Crib is no longer a TSD. Page 4 of this change package includes the footnote associated with the **.</p> <p>Modifications/deletions are denoted using <u>redline/strikeout</u>; additions are denoted with <u>shading</u>.</p>				
Impact of Change:				
Changes to Appendix C and lead regulatory agency; no impact to Tri-Party Agreement milestones or schedule.				
Affected Documents:				
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).				
Approvals:				
K. Klein, RL	_____	__ Approved	__ Disapproved	
	Date			
Nick Ceto, EPA	_____	__ Approved	__ Disapproved	
	Date			
Michael A. Wilson, Ecology	_____	__ Approved	__ Disapproved	
	Date			

Appendix C

Listing by Operable Unit. (Sheet 85 of 88)

OPERABLE UNIT LEAD REGULATORY AGENCY

Waste Unit Name	Waste Unit Aliases	Unit Type	Status
200-UW-1	Ecology	RPP	
200-W-42	200-W-42, U Plant Radioactive Process Sewer from 221-U to 216-U-8 & 216-U-12	Radioactive Process	
200-W-56	200-W-56, Debris North of 221-U	Dumping Area	
200-W-57		Dump	
200-W-71	200-W-71, Undocumented Trench	Trench	
200-W-77	200-W-77, Posted Contamination Area East of 216-U-14 Ditch	Unplanned Release	
200-W-85	200-W-85, Soil Contamination Area East of 2727 W	Unplanned Release	
200-W-87	200-W-87, Unplanned Release on Chemical Spur Railroad Track Northwest of 221-U	Unplanned Release	
200-W-89	200-W-89, 252-U, U Plant Electrical Substation, C8S17 Substation, U-Cat	Foundation	
216-U-1&2	216-U-1&2, 361-WR (Crib 2), 216-U-3, 216-UR #1&2 Cribs, 216-U-1 & 2	Crib	
216-U-4	216-U-4, 222-U Dry Well, 222-U-110 Dry Well, 216-U-2, 216-U-4 Dry Well	Injection/Reverse Well	
216-U-4A	216-U-4A, 216-U-4 Reverse Well Replacement French Drain, 216-U-4 Dry Well	French Drain	
216-U-4B	216-U-4B, 216-U-4B Dry Well, 216-U-4B French Drain	French Drain	

Appendix C

Listing by Operable Unit. (Sheet 86 of 88)

OPERABLE UNIT LEAD REGULATORY AGENCY

Waste Unit Name	Waste Unit Aliases	Unit Type	Status
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200-UW-1 continued)

216-U-5	216-U-5, 216-U-4, 221-U Cold U Trench #2	Trench	
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216-U-6	216-U-6, U Facility Unirradiated Uranium Waste Trench, 221-U Cold U Trench, 216-U Cold U Trench #1, 216-U-5, 221-U Cold U Grave #1	Trench	
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216-U-8	216-U-8, 216-WR-1,2,3 Cribs, 216-U-9	Crib	
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216-U-12 22	216-U-12, 216-U-12 Crib	Crib	
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216-U-15	216-U-15, UN-216-W-10, 388-U Tank Dumping, UPR-200-W-125, UN-200-W-158, U-152 Interface Crud Burial	Trench	*CPP
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216-U-16	216-U-16, UO3 Crib	Crib	
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216-U-17	216-U-17, 216-U-17 Crib	Crib	
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241-U-361	241-U-361, 241-U-361 Settling Tank, 361-U-TANK, IMUST, Inactive Miscellaneous Underground Storage Tank	Settling Tank	
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2607-W5*	2607-W5, Septic Tank and Drain Field	Septic Tank	
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2607-W7	2607-W7, Septic Tank	Septic Tank	
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UPR-200-W-8	UPR-200-W-8, UN-200-W-8, 200-W-5, Old Burial/Burning Pit, U-Plant Burning Pit/Burial Ground	Unplanned Release	
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Appendix C

Listing by Operable Unit. (Sheet 87 of 88)

OPERABLE UNIT LEAD REGULATORY AGENCY

Waste Unit Name	Waste Unit Aliases	Unit Type	Status
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200-UW-1 (continued)

UPR-200-W-19	UPR-200-W-19, 241-U-361 Overflow, UN-200-W-19	Unplanned Release	
UPR-200-W-33	UPR-200-W-33, Ground Contamination at 224-U, UN-200-W-33 Crib	Unplanned Release	
UPR-200-W-48	UPR-200-W-48, Contaminated Railroad Track near 221-U, UN-200-W-48	Unplanned Release	
UPR-200-W-55	UPR-200-W-55, Uranium Powder Spill at 224-U, UN-200-W-55	Unplanned Release	
UPR-200-W-60	UPR-200-W-60, Railroad Contamination, UN-200-W-60	Unplanned Release	
UPR-200-W-78	UPR-200-W-78, UO3 Powder Spill at 224-U, UN-200-W-78	Unplanned Release	
UPR-200-W-117	UPR-200-W-117, Railroad Track Contamination, UN-216-W-27	Unplanned Release	
UPR-200-W-118	UPR-200-W-118, Contamination at 211-U, UN-216-W-28, UN-200-W-118	Unplanned Release	
UPR-200-W-163	UPR-200-W-163, Contaminated Vegetation at the 216-U-8 Pipeline, (200-W-42) UN-216-W-33	Unplanned Release	

Appendix C

Listing by Operable Unit (Sheet 88 of 88)

Groundwater Operable Units

Operable Unit	Lead Regulatory Agency
100-BC-5 (GW O.U.)	EPA
100-FR-3 (GW O.U.)	EPA
100-HR-3 (GW O.U.)	Ecology
100-KR-4 (GW O.U.)	EPA
100-NR-2 (GW O.U.)	Ecology
200-BP-5 (GW O.U.)	EPA
200-PO-1 (GW O.U.)	Ecology
200-UP-1 (GW O.U.)	Ecology
200-ZP-1 (GW O.U.)	EPA
300-FF-5 (GW O.U.)	EPA

* Active waste management units where a hazardous substance has been potentially released or a substantial threat of a release of a hazardous substance exists.

**Treatment Storage and Disposal (TSD) units where closure and permitting activities are to be coordinated with past practice investigation and remediation activities.

† Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units (1999)